

LYNNE C. HERMLE (BAR NO. 99779)  
lchermle@orrick.com  
JOSEPH C. LIBURT (BAR NO. 155507)  
jliburt@orrick.com  
ORRICK, HERRINGTON & SUTCLIFFE  
LLP  
1000 Marsh Road  
Menlo Park, CA 94025-1015  
Telephone: +1 650 614 7400  
Facsimile: +1 650 614 7401

Zoya Kovalenko (BAR NO. 338624)  
13221 Oakland Hills Blvd., Apt. 206  
Germantown, MD 20874  
+1 678 559 4682  
zoyavk@outlook.com

*Plaintiff Zoya Kovalenko*

MARK THOMPSON (Admitted *pro hac*  
*vice*)  
mthompson@orrick.com  
ORRICK, HERRINGTON & SUTCLIFFE  
LLP  
51 W 52nd Street  
New York, NY 10019  
Telephone: +1 212 506 5000  
Facsimile: +1 212 506 5151

*Attorneys for Defendants*

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

ZOYA KOVALENKO,

Plaintiff,

v.

KIRKLAND & ELLIS LLP, MICHAEL DE  
VRIES, MICHAEL W. DE VRIES, P.C.,  
ADAM ALPER, ADAM R. ALPER, P.C.,  
AKSHAY DEORAS, AKSHAY S. DEORAS,  
P.C., AND MARK FAHEY,

Defendants.

Case No. 4:22-CV-05990-HSG

**JOINT STIPULATION REQUESTING  
EXTENSION OF CERTAIN  
SCHEDULING DEADLINES  
[PROPOSED ORDER]**

Pursuant to Civil Local Rules 6-2 and 7-12 of the Northern District of California, and the Honorable Haywood S. Gilliam, Jr.'s Standing Order, Paragraph 15, Plaintiff Zoya Kovalenko and Defendants Kirkland & Ellis LLP, Michael De Vries, Michael W. De Vries, P.C., Adam Alper, Adam R. Alper, P.C., Akshay Deoras, Akshay S. Deoras, P.C., and Mark Fahey (collectively, "Defendants") hereby enter this stipulation and, in light of the facts set forth below, respectfully request to extend the deadlines for certain scheduling deadlines without moving the dispositive motion hearing date, the Pretrial Conference or trial date.

WHEREAS, on October 9, 2024, the Court entered an order (Dkt. No. 152) setting the following deadlines pursuant to Federal Rule of Civil Procedure 16 and Civil Local Rule 16-10:

Event	Deadline
Exchange of Opening Expert Reports	March 10, 2025
Exchange of Rebuttal Expert Reports	April 10, 2025

<b>Close of All Discovery</b>	May 12, 2025
<b>Dispositive and <i>Daubert</i> Motion Hearing Deadline</b>	August 7, 2025, at 2:00 p.m.
<b>Pretrial Conference</b>	November 4, 2025, at 3:00 p.m.
<b>Jury Trial (10 days)</b>	December 8, 2025, at 8:30 a.m.

WHEREAS, the Parties request that the Court extend the expert reports, close of all discovery, and *Daubert* motion hearing deadlines. Good cause exists to extend these deadlines so the Court can rule on the pending cross-motions

Accordingly, the parties request that the expert reports, close of all discovery, and *Daubert* motion hearing deadlines be modified as follows. The Parties do not seek to move the dispositive motion hearing, the pretrial conference, or the trial date.

<b>Event</b>	<b>Deadline</b>
<b>Exchange of Opening Expert Reports</b>	May 9, 2025
<b>Exchange of Rebuttal Expert Reports</b>	June 9, 2025
<b>Close of All Discovery</b>	July 11, 2025
<b>Dispositive Motion Hearing Deadline</b>	August 7, 2025, at 2:00 pm
<b><i>Daubert</i> Motion Hearing Deadline</b>	September 11, 2025, at 2:00 p.m.
<b>Pretrial Conference</b>	November 4, 2025, at 3:00 p.m.
<b>Jury Trial (10 days)</b>	December 8, 2025, at 8:30 a.m.

Per Civil Local Rule 6-2(a), all previous time modifications in the case follow:

- A stipulation to specially set the briefing schedule on motions filed in response to the complaint was filed on December 20, 2022, and granted on December 21, 2022. Dkt. Nos. 44, 43.

- 1 • A stipulation to extend deadlines to comply with initial discovery obligations pursuant to  
2 General Order No. 71 and to set the briefing schedule for K&E's Anti-SLAPP Motion was filed  
3 on January 9, 2023, and granted on January 10, 2023. Dkt. Nos. 61, 59.
- 4 • A stipulation to extend time for Plaintiff to object/respond to K&E's first sets of interrogatories  
5 and requests for production from September 7 to October 9, 2023, was filed on August 30, 2023.  
6 Dkt. No. 93; Civil L.R. 6-1(a).
- 7 • A stipulation to extend time for Defendants to answer Plaintiff's Amended Complaint was filed  
8 on September 26, 2023 and granted on September 27, 2023. Dkt. Nos. 95, 96; Civil L.R. 6-2.
- 9 • A stipulation to extend time for Plaintiff to object/respond to K&E's first sets of interrogatories  
10 and requests for production from October 9, 2023, to November 8, 2023, was filed on October  
11 6, 2023. Dkt. No. 100; Civil L.R. 6-1(a).
- 12 • A stipulation to extend time regarding the motion to dismiss the amended complaint was filed  
13 on October 27, 2023, and granted on October 30, 2023. Dkt. Nos. 106, 104; Civil L.R. 6-1(b)  
14 & 6-2.
- 15 • A stipulation to specially set a briefing schedule on Plaintiff's Motion to Quash K&E's  
16 subpoenas and for Protective Order and to reset hearing dates was filed on December 27, 2023,  
17 and granted on December 28, 2023. Dkt. Nos. 115, 114; Civil L.R. 6-2.
- 18 • A stipulation to extend the deadline to respond to Plaintiff's first requests for production was  
19 filed and granted on May 9, 2024. Dkt. Nos. 138, 136; Civil L.R. 6-2.

20 NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED that, subject to  
21 Court approval, the scheduling deadlines be modified as set forth above. All other deadlines shall  
22 remain in effect. IT IS SO STIPULATED.

23  
24  
25  
26  
27  
28

1 Respectfully submitted,

2  
3 Dated: March 3, 2025

JOSEPH C. LIBURT  
Orrick, Herrington & Sutcliffe LLP

4  
5 By: /s/ Joseph C. Liburt  
Joseph C. Liburt  
Attorneys for Defendants

6  
7 Dated: March 3, 2025

ZOYA KOVALENKO

8  
9  
10 By: /s/ Zoya Kovalenko  
Zoya Kovalenko  
Plaintiff

11  
12  
13 **Attestation Re Electronic Signatures**

14 I, Joseph C. Liburt, attest pursuant to Northern District Local Rule 5-1(i)(3) that all other  
15 signatories to this document, on whose behalf this filing is submitted, concur in the filing's  
16 content and have authorized this filing. I declare under penalty of perjury under the laws of the  
17 United States of America that the foregoing is true and correct.

18  
19 Dated: March 3, 2025

/s/ Joseph C. Liburt  
Joseph C. Liburt

**[PROPOSED] ORDER**

PURSUANT TO STIPULATION AND GOOD CAUSE APPEARING, IT IS ORDERED THAT THE ORDER ENTERED ON OCTOBER 9, 2024 (DKT. NO. 152) IS MODIFIED AS FOLLOWS:

<b>Event</b>	<b>Deadline</b>
<b>Exchange of Opening Expert Reports</b>	May 9, 2025
<b>Exchange of Rebuttal Expert Reports</b>	June 9, 2025
<b>Close of All Discovery</b>	July 11, 2025
<b>Dispositive Motion Hearing Deadline</b>	August 7, 2025, at 2:00 pm
<b><i>Daubert</i> Motion Hearing Deadline</b>	September 11, 2025, at 2:00 p.m.
<b>Pretrial Conference</b>	November 4, 2025, at 3:00 p.m.
<b>Jury Trial (10 days)</b>	December 8, 2025, at 8:30 a.m.

NO OTHER SCHEDULING DEADLINES ARE MODIFIED.

DATED:

\_\_\_\_\_  
HAYWOOD S. GILLIAM, JR.  
United States District Judge